

MARSHALL DENNEHEY WARNER COLEMAN & GOGGIN

ATTORNEYS-AT-LAW WWW.MARSHALLDENNEHEY.COM

A PROFESSIONAL CORPORATION

425 Eagle Rock Avenue, Suite 302, Roseland, NJ 07068
(973) 618-4100 Fax (973) 618-0685

Justin F. Johnson, Resident Managing Attorney

Direct Dial: (973) 618-4118

Email: hbmankoff@mdwcg.com

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December 9, 2019

ELECTRONICALLY FILED

Magistrate Douglas E. Arpert, U.S.M.J.
United States District Court
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

RE: Agudath Israel of America v. Township of Jackson, New Jersey
Docket No.: 3:17-cv-03226-MAS-DEA
Our File No.: 41034.00107

Dear Judge Arpert:

I write to provide defendants' status report. I first note that we expect to provide interrogatory answers within two weeks. The sheer volume of the discovery responses has simply been overwhelming the Town's limited resources. As to the document production, we expect to complete the document production within the next ten days. I note this will be several hundred thousand pages of documents. I also wish to advise the Court that the defendant hired a vendor, at a very significant expense, to assist in the production of these documents.

While I regret the delay, the plaintiffs have propounded hundreds of interrogatories and document demands and the defendants are doing their best to provide responses.

Respectfully,

/s/ Howard B. Mankoff

Howard B. Mankoff

HBM:lt

cc: All Counsel of Record – Via ECF